H:\FILES\DAN\WYATT\Motion to Seal.wpd

UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

NORWOOD WYATT)
) C.A. No. 05-655-KAJ
)
) JURY OF 12 DEMANDEI
Plaintiff,)
)
v.)
)
FIRST CORRECTIONAL MEDICAL and)
DR. SITTA GOMBEH ALI)
)
Defendants.)

FIRST CORRECTIONAL MEDICAL'S MOTION TO SEAL

First Correctional Medical, hereinafter "FCM", moves the Court for a protective order sealing the address of Sitta Gombeh-Alie, M.D. In support of its motion, FCM offers the following:

1. Pursuant to the October 13, 2006, Order, this Court requested that FCM provide the last known address of the following individual:

Sitta Gombeh-Alie, M.D.

2. This individual has worked, and may continue to work, in the Delaware Prison System. Due to the sensitive nature of her employment and the population she serves/served, FCM requests, for both the protection and privacy of Dr. Alie, that her personal information be kept under seal.

3. In order to comply with the October 13, 2006, Court Order, FCM has attached the requested address as Exhibit A and prays that this Court will see that service as to this individual is handled by the Federal Marshal Service without the plaintiff gaining access to the private information of FCM's former employee.

4. For the above mentioned reasons, FCM requests that this Court seal the address of FCM's former employee.

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar #2689 Dana Spring Monzo, Del. Bar # 4605 McCullough & McKenty, P.A. 1225 N. King Street, Suite 1100 Wilmington, DE 19899-0397 (302) 655-6749 Attorneys for Defendants

Dated: November 3, 2006

UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

NORWOOD WYATT) C.A. No. 05-65	5-KAJ
Plaintiff, v. FIRST CORRECTIONAL MEDICAL and DR. SITTA GOMBEH ALI) JURY OF 12 E))))))))	DEMANDED
Defendants,)	
<u>OR</u>	RDER	
AND NOW, the Court having considere	d First Correctional Medical	's Motion to Seal, and
it appearing that the motion is brought in good to	faith,	
IT IS HEREBY ORDERED this	day of	, 2006, that
the address of First Correctional Medical's form	ner employee be sealed.	
	.j.	

UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

NORWOOD WYATT	
) C.A. No. 05-655-KAJ
) JURY OF 12 DEMANDED
Plaintiff,)
)
v.)
)
FIRST CORRECTIONAL MEDICAL and)
DR. SITTA GOMBEH ALI)
)
Defendants,)

FIRST CORRECTIONAL MEDICAL'S MOTION TO SEAL - EXHIBIT A

CONFIDENTIAL - FILED UNDER SEAL SUBJECT TO A PROTECTIVE ORDER

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar #2689 Dana Spring Monzo, Del. Bar # 4605 McCullough & McKenty, P.A. 1225 N. King Street, Suite 1100 Wilmington, DE 19899-0397 (302) 655-6749 Attorneys for Defendants

Dated: November 3, 2006

UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

NORWOOD WYATT	
) C.A. No. 05-655-KAJ
) JURY OF 12 DEMANDED
Plaintiff,)
v.)
FIRST CORRECTIONAL MEDICAL and)
DR. SITTA GOMBEH ALI)
Defendants.)

CERTIFICATE OF SERVICE

I, DANA SPRING MONZO, hereby certify that on this date, First Correctional Medical's

Motion to Seal was served, via first class mail, upon the following:

Norwood Wyatt SBI# 167137 **Delaware Correctional Center** 1181 Paddock Road Smyrna, DE 19977

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo Daniel L. McKenty, Del. Bar #2689 Dana Spring Monzo, Del. Bar # 4605 McCullough & McKenty, P.A. 1225 N. King Street, Suite 1100 Wilmington, DE 19899-0397

(302) 655-6749

Attorneys for Defendants

Dated: November 3, 2006